

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC., et al.,)
)
<i>Plaintiffs,</i>)
)
vs.)
) Civil Action No. BAH-25-337
DONALD J. TRUMP, in his official capacity)
as President of the United States, et al.,)
)
<i>Defendants.</i>)
)
)

**COMMUNICATIONS WORKERS OF AMERICA'S
MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF**

Communications Workers of America ("CWA") respectfully requests leave to file the accompanying *Amicus Curiae* Brief in support of Plaintiffs' motion for a preliminary injunction, ECF 69. Counsel for Plaintiffs have consented to the filing of this amicus brief. Counsel for Defendants have not responded to the request for consent sent Sunday, February 23. No counsel for a party authored any part of this brief. No party, party's counsel, or any person other than amicus curiae, its members, or its counsel contributed money that was intended to finance the preparation or submission of this brief. *See Local Rule 105(12)(b).*

CWA is a labor union that represents workers in private and public sector employment in 1,200 charted local unions around the country. CWA's members work in a diverse array of industries, including healthcare, higher education, communications, information, media, airlines, television, public service, and manufacturing. Many of CWA's members work in institutions that rely on federal funds and provide gender affirming care to youths.

CWA submits this brief to highlight the irreparable harm to healthcare workers, including CWA's members, that is currently being caused by Executive Orders 14168 and 14187, and to place those Executive Orders into the larger context of the current Administration's discriminatory attacks on transgender people and flagrant unlawful conduct. As a result, the proposed brief will assist the Court in evaluating Plaintiffs' pending motion for a preliminary injunction. *See HIAS, Inc. v. Trump*, 985 F.3d 309, 318 (4th Cir. 2021). "Courts typically grant *amicus* status where the parties 'contribute to the court's understanding of the matter in question' by proffering timely and useful information." *Recht v. Just.*, 2020 WL 6109426, at *1 (N.D.W. Va. June 9, 2020) (quoting *Ga. Aquarium, Inc. v. Pritzker*, 135 F.Supp.3d 1280, 1288 (N.D. Ga. 2015)). CWA's proposed amicus brief provides timely and useful information.

DATED this 24th day of February, 2025.

Respectfully submitted,

/s/ Kathleen Keller
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*Pro Hac Vice application pending